

September 29, 2017

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Telephone Number Portability, et al.
CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149

Dear Secretary Dortch:

The North American Portability Management LLC (the "NAPM LLC"), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission ("FCC" or "Commission") regarding the transition from the current local number portability administrator ("LNPA"), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the "Report").¹ This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with requirements of the LNPA Selection Order² and guidance received from the FCC on June 24, 2015.³ The NAPM LLC will continue to file written updates of this Report with the FCC at the end of each month until transition is complete.

Transition Oversight Plan

The Transition Oversight Plan ("TOP"), dated August 31, 2015 was edited and refiled December 5, 2016, and the TOP is published on the public portion of the NAPM LLC's website at www.NAPMLLC.org.⁴ Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

¹ This Report is intended to provide an update with respect to events that occurred during the prior month. Although the monthly Reports may, at times, reflect certain developments that occurred between the end of the month for which the Report is filed and the date upon which the draft Report received final approval by the NAPM LLC for filing with the Commission, the Reports generally do not reflect all developments that occur during the month in which the Report is filed, which will be reflected in the Report for the following month. Please review previous Reports for information about previous developments.

² *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

³ This summary reflects information relevant to the transition as managed by the NAPM LLC with the assistance of the TOM and the oversight of the Commission.

⁴ See https://www.napmlc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf.

Stakeholder Outreach and Education

Since the last Report, the Transition Oversight Manager (the "TOM") presented transition updates at the following events:

- The August LNPA WG and APT calls on August 22, 2017; and
- The August TOEP webcast on August 16, 2017, which was attended by 197 participants.

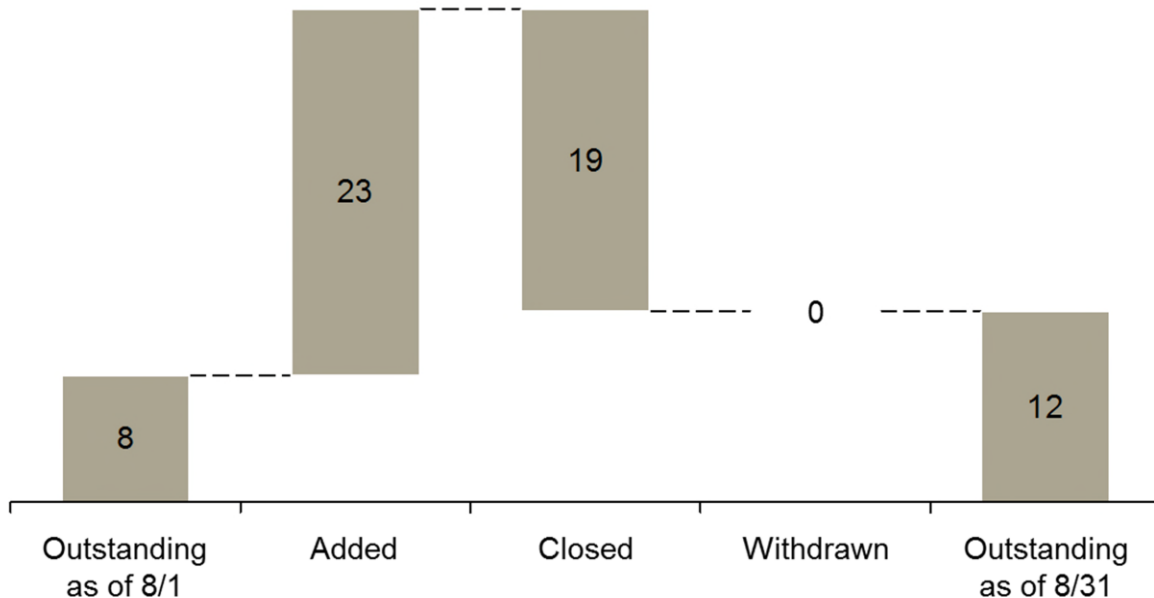
TOM Transition Activities

The TOM continued to advance the objectives of the LNPA transition program in August. The accomplishments in August include:

- Monitored industry testing of the new Number Portability Administration Center (NPAC):
 - 14 vendor systems under test (SUTs) in vendor certification;
 - 5 service provider SUTs in service provider testing;
 - 4 vendor SUTs have completed certification as of August 31, 2017;
 - LTI user testing began with 3 users and 8 users are preparing for testing;
- Facilitated multilateral vendor testing meetings to resolve vendor testing incidents. In August, 50 incidents were resolved. Additionally, 5 issues which involve potential specifications changes or iconectiv change orders were brought to the LNPA Working Group where next steps will be to reach alignment on whether to issue change orders and on change order priority;
- Verified that 48 of 58 Industry Methods and Procedures (M&P) were approved and 3 are under review;
- Secured FCC approval of the Enhanced Law Enforcement Platform (ELEP) Acceptance Test Plan (ATP) and facilitated FCC review of the Disaster Recovery and Pooling Administrator System (PAS) ATPs;
- Hosted an industry Contingency Rollback follow-up session on August 16, 2017 to review industry feedback on the rollback approach, introduce transaction report specifications document, and provide an overview of a high-level timeline and next steps. There were 105 attendees via teleconference; and
- Concluded the July TOEP survey which was conducted from July 24, 2017 through August 7, 2017 to solicit feedback on the transition, with a focus on testing and resulted in 68 responses.

The TOM conducts weekly meetings with the NAPM LLC Transition Team, iconectiv and Neustar to coordinate activities and communication across the parties and address ad hoc issues as they arise. These working meetings are used to identify, discuss and close tasks (A.K.A. action items) required to advance the project objectives. The graph below depicts the progress achieved in addressing these action items since the last monthly report.

Transition Action Item Progress (8/1/17 through 8/31/17)



The TOM continues to track identified LNPA transition risks including the summary program risks below:

- Lack of agreement on key transition requirements has prevented certain transition plans from being finalized;
- Agreement of appropriate contractual obligations governing contingency rollback and parallel operations;
- Delays in onboarding the one remaining mechanized service bureau threatens the on-time completion of mechanized user testing. The TOM is engaging the appropriate parties in attempt to reach resolution;
- Vendor testing has uncovered issues which are categorized as undocumented features, inadequate documentation, and differences in interpretation. Additional development by iconectiv, if required, will add to existing schedule pressure;
 - As of August 31, 2017, 16 such issues have been escalated to the LNPA Working Group for resolution. There have been 14 Problem Issue Management Statements (PIMs) submitted, resulting in 3 Change Orders.
- Vendor testing identified instances in which Vendor systems under test do not appear to be in strict compliance with the NPAC interface specifications. Prolonged testing and deployment of upgrades or patches, if necessary, may delay the completion of testing or require testing activities to be re-sequenced;
 - As of August 29, 2017, there were 30 active vendor testing incidents. Of those, 26 were associated with a single vendor. Delayed resolution of these vendor testing incidents may postpone portions of mandatory service provider testing; and

- There is little remaining buffer in the Release B development schedule to absorb delays and/or unplanned development activities arising from FRS variances like the NOT Filter or post-July PAS API updates. Potential development efforts to address issues discovered in vendor testing may exceed the available pre-FAD development and test capacity.

iconectiv

On July 25, 2016, the FCC released a final decision approving the recommendation of the NANC that iconectiv serve as the next LNPA and the terms and conditions of the draft Master Services Agreement ("MSA") that the NAPM LLC and iconectiv had previously submitted to the FCC.⁵ On August 8, 2016, the NAPM LLC and iconectiv executed the MSA. On September 21, 2016, iconectiv held the first of several planned LNPA Transition onboarding webcasts for Service Providers, Service Bureaus and Providers of Telecom Related Services. In addition, iconectiv is moving forward with meeting the requirements and deadlines set forth in the Master Services Agreement.

iconectiv continued to on-board users to its new NPAC platform. Current on-boarding status as of September 1, 2017 shows:

- ~78% of SP/SB/PTRS users have started the on-boarding process;
- 1,120 NPAC users have completed registration;
- 12 of 13 Service Bureaus have completed on-boarding, leaving a single, remaining service bureau which has not completed the initial onboarding step (see transition risk tracking above);
- All LSMS and SOA vendors have executed the vendor testing and confidentiality agreements;
- 116 WDNC entities have started registration and 23 WDNC entities have completed registration;
- 65% of ELEM entities have responded to initial outreach, 46% of ELEM entities have completed registration forms and are processing the service agreements, and 6% have fully registered; and;
- Public Safety / IVR registration was launched in 17 states and 402 have completed registration.

For information from iconectiv about the NPAC transition, please send an email to **LNPA-ACCT-MGMT@iconectiv.numberportability.com**

Neustar

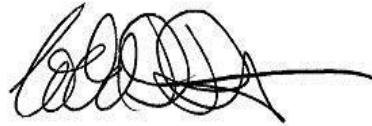
Neustar began billing industry service providers on their December 2015 monthly Statement of Work ("SOW") invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to discuss transition related issues, was signed by Neustar, the NAPM, the TOM, and iconectiv on February 2, 2017. Lastly, Neustar has executed the appropriate User Agreement with iconectiv, and is taking steps to complete the vendor on-boarding process.

* * *

⁵ See *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (rel. July 27, 2015) (*LNPA Approval Order*).





Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd D. Daubert', with a long horizontal flourish extending to the right.

Todd D. Daubert
Counsel to the NAPM LLC

Appendix A: Overall Transition Status Dashboard

NPAC SMS Platform Build		<ul style="list-style-type: none">• Data center construction and configuration is complete ahead of planned October end point• Release A development is complete• Release B development is code complete for planned functionality, but minimal buffer remains to accommodate new requirements
Outreach and On-boarding		<ul style="list-style-type: none">• 78% of SP/SB/PTRS NPAC users representing 79% of SPIDs are engaged in on-boarding process• 1,120 users have completed registration
Industry Testing		<ul style="list-style-type: none">• 9 Acceptance Test Plans (ATP) have been approved in coordination with the FCC• Industry testing is in progress; CMIP vendor testing is nearly complete and service provider testing has started• Vendor testing has surfaced issues, which are requiring longer than planned timeframe to resolve
Data Migration and Go-Live		<ul style="list-style-type: none">• Finalizing parallel operations requirements• Conducting Phase 2 data migration testing